

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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ILUMINADA ORTEGA,

Plaintiff,

v.

CHAMPAGNE ROOM BK, INC d/b/a DRAFT  
BARN d/b/a END ZONE SPORTS BAR &  
LOUNGE, RUBEN YEGHOYAN, and SARKIS  
AVOYANTS,

Defendants.  
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Case No.: 1:21-cv-1125 (NGG) (CLP)

**PLAINTIFF'S NOTICE OF  
MOTION FOR DEFAULT  
JUDGMENT AGAINST  
DEFENDANT SARKIS AVOYANTS**

**PLEASE TAKE NOTICE THAT**, upon the annexed affirmation of Jonathan Shalom, Esq., and attached exhibits, and the affidavit of Plaintiff ILUMINADA ORTEGA, and all prior papers and proceedings in this case, the Plaintiff, by his undersigned counsel, will move this Court, on such date as is set by the Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 55.2(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (hereinafter the "Local Civil Rules"), for judgment by default against Defendant SARKIS AVOYANTS (hereinafter "Defendant").

**PLEASE TAKE FURTHER NOTICE THAT**, pursuant to this Local Civil Rule 6.1(b), answering papers, if any, shall be served on the undersigned no later than Monday, November 20, 2023, and Plaintiff shall file reply papers in further support no later than Monday, November 27, 2023.

Dated: Forest Hills, New York  
November 6, 2023

Respectfully submitted,

**SHALOM LAW, PLLC**

/s/

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*Attorneys for Plaintiff*  
*Illuminada Ortega*